

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| | : |
| TELENOR MOBILE COMMUNICATIONS AS, | : |
| | : |
| Petitioner, | : |
| | : |
| -against- | : |
| | : |
| STORM LLC, | : |
| | : |
| Respondent. | : |
| -----X | |

07 Civ. 6929

ECF Case

DECLARATION OF GONZALO S. ZEBALLOS

I, Gonzalo S. Zeballos, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate at Lovells LLP, attorneys for Respondent Storm LLC ("Storm") in the above-captioned proceeding. I am a member in good standing of the Bar of the State of New York and of this Court.

2. I submit this declaration in support of Storm's Memorandum of Law in Opposition to Telenor Mobile Communications AS' ("Telenor Mobile") Petition to Confirm and in Support of Storm's Motion to Vacate Arbitration Award, and in order to put relevant documents before the Court.

3. Attached hereto as Exhibit A is a true and correct copy of the Tribunal's Final Award (the "Award") in the Arbitration between Telenor Mobile and Storm. The Award is dated July 2, 2007 but was not issued until August 1, 2007. Unless otherwise noted, all exhibits mentioned below were submitted in the arbitration proceedings between Telenor Mobile and Storm.

4. Attached hereto as Exhibit B is a true and correct copy of the original Ukrainian version and an English translation of an April 25, 2006 Order rendered by the Kyiv Commercial Court.

5. Attached hereto as Exhibit C is a true and correct copy of the Affidavit of Vadim Klymenko, submitted by Storm on August 9, 2006. Appended thereto is a correction to the Affidavit, submitted by Storm on August 13, 2006.

6. Attached hereto as Exhibit D is a true and correct copy of the original Ukrainian version and an English translation of a May 25, 2006 Order rendered by the Kyiv Appellate Commercial Court.

7. Attached hereto as Exhibit E is a true and correct copy of Storm's Proposed Findings of Fact and Conclusions of Law, submitted on September 12, 2006. Please note that the Legal Opinion by Lyubov Logush, Storm's Evidentiary Brief and the Declaration of Anna-Marta Khomyak, cited therein, are attached as Exhibits F, G and J, respectively, to this Declaration.

8. Attached hereto as Exhibit F is a true and correct copy of the Legal Opinion by Lyubov Logush, submitted by Storm on August 9, 2006, with relevant exhibits thereto.

9. Attached hereto as Exhibit G is a true and correct copy of the Brief on the Evidentiary Standard for Storm's Motion to Dismiss the Amended Statement of Claim, submitted by Storm on August 9, 2006. Please note that the Affidavit of Vadim Klymenko, cited therein, is attached as Exhibit C to this Declaration.

10. Attached hereto as Exhibit H is a true and correct copy of the Arbitration Tribunal's Partial Final Award Regarding Jurisdiction, issued on October 22, 2006.

11. Attached hereto as Exhibit I is a true and correct copy of the Transcript of the September 5, 2006 hearing before the Arbitration Tribunal.

12. Attached hereto as Exhibit J is a true and correct copy of the Declaration of Anna-Marta Khomyak in Support of Storm's Motion to Dismiss for Lack of Jurisdiction, submitted by Storm on August 9, 2006. Please note that the April 25, 2006 Order rendered by the Kyiv Commercial Court and the May 25, 2006 Order rendered by the Kyiv Appellate Commercial Court, cited therein, are attached as Exhibits B and D, respectively, to this Declaration.

13. Attached hereto as Exhibit K is a true and correct copy of the original Ukrainian version and an English translation of the Clarification Order of the Kyiv Appellate Commercial Court, dated November 8, 2006.

14. Attached hereto as Exhibit L is a true and correct copy of a November 21, 2006 e-mail sent by Pieter Van Tol to the Arbitration Tribunal.

15. Attached hereto as Exhibit M is a true and correct copy of the letter sent by Pieter Van Tol to the Arbitration Tribunal on March 14, 2007, responding to the Tribunal's Interim Order Directing Further Briefing, with relevant exhibits thereto.

16. Attached hereto as Exhibit N is a true and correct copy of the Transcript of the June 29, 2006 hearing before the Arbitration Tribunal.

17. Attached hereto as Exhibit O is a true and correct copy of the Transcript of the August 14, 2006 hearing before the Arbitration Tribunal.

18. Attached hereto as Exhibit P is a true and correct copy of the January 6, 2006 agreement between Kyivstar and Ernst & Young entities for the provision of auditing services.

19. Attached hereto as Exhibit Q is a true and correct copy of the May 3, 2006 agreement between Kyivstar and Ernst & Young entities for the provision of auditing services.

20. Attached hereto as Exhibit R is a true and correct copy of the original Ukrainian version and an English translation of the December 22, 2005 Order of the Highest Commercial Court of Ukraine.

21. Attached hereto as Exhibit S is a true and correct copy of the original Ukrainian version and an English translation of a Statement of Claim filed by Storm against Closed Joint Stock Company "Kyivstar G.S.M.", Limited Liability Company "Ernst & Young Audit Services" and Limited Liability Company "Ernst & Young" in Kyiv City Commercial Court on December 21, 2006.

22. Attached hereto as Exhibit T is a true and correct copy of the original Ukrainian version and an English translation of the Kyiv City Commercial Court's Petition to Cancel Injunctive Relief, issued on January 18, 2007.

23. Attached hereto as Exhibit U is a true and correct copy of the original Ukrainian version and an English translation of a Statement of Claim filed by Alpren Limited against Vladym Klymenko, Trond Moe, Closed Joint Stock Company "Kyivstar G.S.M.", Limited Liability Company "Ernst & Young Audit Services" and Limited Liability Company "Ernst & Young" in the Krasnolutsky District Court of Lugansk Region on January 31, 2007.

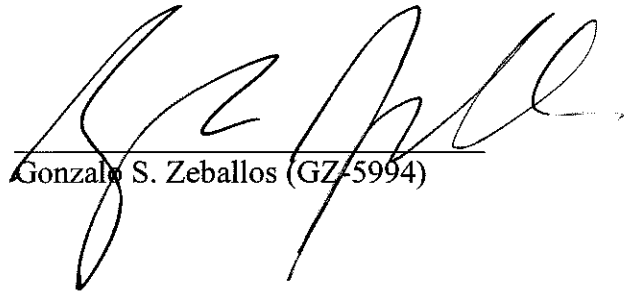
24. Attached hereto as Exhibit V is a true and correct copy of the original Ukrainian version and an English translation of a Statement of Claim filed by Alpren Limited against Closed Joint Stock Company "Kyivstar G.S.M.", Limited Liability Company "Ernst & Young

Audit Services" and Limited Liability Company "Ernst & Young" in Kyiv City Commercial Court on February 16, 2007.

25. Attached hereto as Exhibit W is a true and correct copy of the Order of the Golosiyiv District Court of the city of Kyiv with attached Rulings, issued December 1, 2006, English translations provided by Storm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 16, 2007 at New York, New York.



Gonzalo S. Zeballos (GZ-5994)